



METHFESSEL & WERBEL

A Professional Corporation

JOEL N. WERBEL>
JOHN METHFESSEL, JR.>
FREDRIC PAUL GALLIN*+^
WILLIAM S. BLOOM>*
ERIC L. HARRISON*+
MATTHEW A. WERBEL>
LORI BROWN STERNBACK*+
GINA M. STANZIALE>
PAUL J. ENDLER JR.>
JAMES P. CULLEN, JR.=^
THOMAS O. MULVIHILL>
JAMES FOXEN^
SARAH K. DELAHANT+
ATHINA L. CORNELL+
JEFFREY R. MERLINO±
JENNIFER A. OSBORNE+
ANDREW J. GIBBS>
JARED S. SCHURE>
RICHARD A. NELKE~
BRENT R. POHLMAN+

Of Counsel
STEPHEN R. KATZMAN#
ED THORNTON>
I. BLAKELEY JOHNSTONE, III+*
BETH A. BOLGER+
PAUL E. GRIGGS>

Counsel
ADAM M. CARMAN+^
SHAJI M. EAPEN+
JOSEPH C. FALK>
ANGELA M. GURRERA>
GERALD KAPLAN>
JARED P. KINGSLEY*+
JOHN R. KNODEL*+
LESLIE A. KOCH=
CHARLES T. MCCOOK, JR.*>
CHRISTINA MICHELSON+
STEVEN K. PARNES+
KAJAL J. PATEL+
RAINA M. PITTS^
AMANDA J. SAWYER^
STEVEN A. UNTERBURGER+

Associates
JEFFREY R. BALL≤
KASSIANI CHRYSANTHOPOULOS>
EDWARD D. DEMBLING>
MICHAEL R. EATROFF>
ERICA FRANCISCO-LAU+
ERIN GALARDI<
ELENA GAMMARDELLA≥
CARLOS J. JIMENEZ+
FRANK J. KEENAN+^
SCOTT KETTERER>
ZURAB MAISURADZE>
JOHN M. MARTIN>
ROBERT PLANTER>
HOLLY C. RENSHAW>
NICOLETTE RUBEL>
VITTORIA A. SCULCO>
MANINDER K. SINGH>
ALYCIA M. SWIFT+
TIFFANY D. TAGARELLI>

Retired
JOHN METHFESSEL, SR.>
(1935-2017)
DON CROWLEY*+
(1942-2024)
MARC DEMBLING*+
(1944-2022)

* Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney
+Member of NY & NJ Bar
^Member of PA & NJ Bar
^Member of NY Bar only
>Member of NJ Bar only
#Member of NJ & LA. Bar
<Member of MN Bar
≤Member of NJ, ID & NM Bar
≥Member of NY, NJ & CT Bar
~Member of NY, NJ & DC Bar
=Member of NY, NJ & MA Bar
±Member of NY, NJ & FL Bar

Please reply to New Jersey

March 26, 2026

VIA ECOURTS FILING

Clerk, Camden County Superior Court
Civil Processing, Hall of Justice First Floor
101 South 5th Street
Camden, NJ 08103

RE: **SHORE, BENJAMIN VS. JASON SCHIMPF, ET AL.**

Our File No. : 97726 CMM
Docket No. : CAM-L-477-26

Dear Sir/Madam:

Enclosed please find the following documents:

- ☒ Answer to Verified Complaint
- ☒ Designation of Trial Counsel
- ☒ CIS Form

Very truly yours,

METHFESSEL & WERBEL, ESQS.

Christina Michelson

Christina Michelson
michelson@methwerbel.com
Ext. 195

CMM:akc/Encl.

Methfessel & Werbel, Esqs.

Our File No. 97726 CMM

Page 2

cc: VIA EMAIL: sunny@benshorelaw.com
Benjamin Shore
20 Brace Road Suite 325
Cherry Hill, NJ 08034

Christina Michelson - ID #032412008
 METHFESSEL & WERBEL, ESQS.
 2025 Lincoln Hwy, Suite 200
 Edison, NJ 08817
 732-248-4200
 732-248-2355
 michelson@methwerb.com
 Attorneys for Cherry Hill Township Board of Education and Jason Schimpf
 Our File No. 97726 CMM

BENJAMIN SHORE,

 Plaintiff,

 V.

 JASON SCHIMPF, as his official
 capacity as Record Custodian, and
 CHERRY HILL TOWNSHIP BOARD
 OF EDUCATION,

 Defendants.

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION: CAMDEN COUNTY
 DOCKET NO.: CAM-L-477-26

Civil Action

**ANSWER TO PLAINTIFF'S
 VERIFIED COMPLAINT**

Defendants, Cherry Hill Township Board of Education and Jason Schimpf (hereinafter the "Defendants"), by way of Answer to the Verified Complaint brought by Plaintiff, Benjamin Shore, filed herein says:

PRELIMINARY STATEMENT

1. Denied.
2. The Defendants admit only to the extent that the Plaintiff submitted an Open Public Records Act request dated January 9, 2026. The Plaintiff's request is a document that speaks for itself. The Defendants deny the remaining allegations.
3. The Defendants admit only to the extent that it properly denied the Plaintiff's Open Public Records Act request dated January 9, 2026 in

accordance with N.J.S.A. § 47:1A-1 et. seq. The Defendants' response is a document that speaks for itself. The Defendants deny the remaining allegations.

4. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.

IDENTIFICATION OF PARTIES

5. The Defendants neither admit nor deny the remaining allegations and leave plaintiff to their proofs.
6. The Defendant admits that the Cherry Hill Township Board of Education is located at 45 Ranaldo Terrace, Cherry Hill, NJ 08034. The Defendant admits that the Cherry Hill Township Board of Education is subject to the provisions of Open Public Records Act.
7. The Defendant admits that Jason Schimpf serves as the Assistant Superintendent, Business Administrator, Board Secretary, and Custodian of Records for the Board. The Defendants neither admit nor deny the remaining allegations and leave plaintiff to their proofs.

JURISDICTION, VENUE, AND SUMMARY ACTION

8. Admitted.
9. Admitted.

STATEMENT OF UNDISPUTED FACTS

10. Admitted.

11. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.
12. The Defendants admit that the Plaintiff submitted an Open Public Records Act request dated January 9, 2026. The Plaintiff's OPRA request is a document that speaks for itself.
13. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.
14. The Defendants admit only to the extent that on January 14, 2026, it properly denied the Plaintiff's Open Public Records Act request dated January 9, 2026 in accordance with N.J.S.A. § 47:1A-1 et. seq. The Defendants' response is a document that speaks for itself. The Defendants deny the remaining allegations.
15. The Defendants admit only to the extent that on January 14, 2026, it properly denied the Plaintiff's Open Public Records Act request dated January 9, 2026 in accordance with N.J.S.A. § 47:1A-1 et. seq. The Defendants' response is a document that speaks for itself. The Defendants deny the remaining allegations.
16. The Defendants admit only to the extent that on January 14, 2026, it properly denied the Plaintiff's Open Public Records Act request dated January 9, 2026 in accordance with N.J.S.A. § 47:1A-1 et. seq. This is a document that speaks for itself. The Defendants deny the remaining allegations.

17. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.
18. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.
19. The Defendants admit only to the extent that on January 14, 2026, it properly denied the Plaintiff's Open Public Records Act request dated January 9, 2026 in accordance with N.J.S.A. § 47:1A-1 et. seq. The Defendants' response is a document that speaks for itself. The Defendants deny the remaining allegations.
20. The Defendants admit only to the extent that on January 14, 2026, it properly denied the Plaintiff's Open Public Records Act request dated January 9, 2026 in accordance with N.J.S.A. § 47:1A-1 et. seq. The Defendants' response is a document that speaks for itself. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.
21. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.
22. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.
23. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.

COUNT 1

Violation of OPRA, N.J.S.A. 47:1A-1

24. Defendants hereby incorporate the previous paragraphs as though set forth fully herein.

25. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.

26. Denied. The Defendants properly adhered to the Open Public Records Act, N.J.S.A. § 47:1A-1 et. seq.

27. Denied. The Defendants properly adhered to the Open Public Records Act, N.J.S.A. § 47:1A-1 et. seq.

28. Denied. The Defendants properly adhered to the Open Public Records Act, N.J.S.A. § 47:1A-1 et. seq.

29. Denied. The Defendants properly adhered to the Open Public Records Act, N.J.S.A. § 47:1A-1 et. seq.

30. Denied. The Defendants properly adhered to the Open Public Records Act, N.J.S.A. § 47:1A-1 et. seq.

31. Denied. The Defendants properly adhered to the Open Public Records Act, N.J.S.A. § 47:1A-1 et. seq.

WHEREFORE, Defendants, Cherry Hill Township Board of Education and Jason Schimpf, respectfully demand a judgment dismissing the Verified Complaint with prejudice and awarding fees and costs incurred, and for such other and further relief as the Court may deem just and equitable.

COUNT II

Violation of Plaintiff's Common Law Right to Access Public Documents

32. Defendants hereby incorporate the previous paragraphs as though set forth fully herein.

33. The Defendants neither admit nor deny the allegations and leave plaintiff to his proofs.

34. Denied.

35. Denied.


36. Denied.

37. The allegations of Paragraph 37 contain a legal conclusion to which no response is required.

WHEREFORE, Defendants, Cherry Hill Township Board of Education and Jason Schimpf, respectfully demand a judgment dismissing the Verified Complaint with prejudice and awarding fees and costs incurred, and for such other and further relief as the Court may deem just and equitable.

METHFESSEL & WERBEL, ESQS.

Attorneys for Cherry Hill Township
Board of Education and Jason
Schimpf

By: 
Christina M. Michelson

DATED: March 26, 2026

AFFIRMATIVE DEFENSES

FIRST SEPARATE DEFENSE

The Verified Complaint fails to state a claim upon which relief can be granted.

SECOND SEPARATE DEFENSE

Plaintiff's claims are barred, in whole or in part, by the doctrines of waiver, estoppel, acquiescence, laches and/or unclean hands.

THIRD SEPARATE DEFENSE

At all times relevant hereto, Defendants acted in a manner which was proper, reasonable, lawful, and in the exercise of good faith.

FOURTH SEPARATE DEFENSE

At all times relevant hereto, the Defendants acted in accordance with N.J.S.A. §47:1A-1, et seq.

FIFTH SEPARATE DEFENSE

Plaintiff's claims are barred by public policy

SIXTH SEPARATE DEFENSE

Plaintiff's claim for attorneys' fees and costs pursuant to N.J.S.A. §47:1A-6 should be denied because Plaintiff's requests were properly denied and he is pro se.

SEVENTH SEPARATE DEFENSE

The Complaint, in whole or in part, fails to state a claim upon which an award of attorneys' fees and costs can be granted.

EIGHTH SEPARATE DEFENSE

Defendants' actions, challenged herein, are all valid exercises of and within the scope of Defendants' power and authority under applicable law.

NINTH SEPARATE DEFENSE

The documents Plaintiff seeks are not subject to disclosure under the N.J. Open Public Records Act, N.J.S.A. §47:1A-1 et seq., or any other statute, rule, or law.

TENTH SEPARATE DEFENSE

Plaintiff is not entitled to attorneys' fees and costs under the N.J. Open Public Records Act, N.J.S.A. §47:1A-1 et seq., or any other statute, rule, or law.

ELEVENTH SEPARATE DEFENSE

Defendants are entitled to all requested relief pursuant to N.J.S.A. §47:1A 5.1.

TWELFTH SEPARATE DEFENSE

The Defendants hereby give notice that it may rely upon such other defenses that may become available or apparent hereafter and, thus, reserves the right to amend its answer to assert such defenses.

DESIGNATION OF TRIAL COUNSEL

PURSUANT to the provisions of Rule 4:25-4, the Court is advised that Christina M. Michelson is hereby designated as trial counsel on behalf of the defendant(s), Cherry Hill Township Board of Education and Jason Schimpf.

METHFESSEL & WERBEL, ESQS.

Attorneys for Cherry Hill Township
Board of Education and Jason
Schimpf

By: Christina Michelson
Christina M. Michelson

DATED: March 26, 2026

CERTIFICATION OF NO OTHER ACTIONS

Pursuant to Rule 4:5-1, it is stated that the matter in controversy is subject to Shore Investigates, LLC v. Cherry Hill Board of Education and Jason Schimpf, Docket: CAM-L-3910-25 and Cherry Hill Township Board of Education v. Shore Investigates, LLC, et al, Docket: CAM-L-620-26, which is pending. Further, other than the parties set forth in this pleading, we know of no other parties that should be joined in the above action. In addition, we recognize the continuing obligation of each party to file and serve on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

I further certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

METHFESSEL & WERBEL, ESQS.

Attorneys for Cherry Hill Township
Board of Education and Jason
Schimpf

By: Christina Michelson
Christina M. Michelson

DATED: March 26, 2026

Our File No. 97726

CERTIFICATE OF MAILING

The undersigned hereby certifies as follows:

1. I am employed by the law firm of Methfessel & Werbel.
2. On March 26, 2026 the undersigned prepared and forwarded copies of the within correspondence to the following parties:

VIA ECOURTS FILING

Clerk, Camden County Superior Court
Hall of Justice
101 South 5th Street
Camden, NJ 08103

VIA EMAIL: sunny@benshorelaw.com

Benjamin Shore
20 Brace Road Suite 325
Cherry Hill, NJ 08034

VIA LReX – COURTESY COPY

Honorable Michael S. Mikulski II, J.S.C.
Camden County Hall of Justice
101 South 5th Street, 4th Floor
Camden, NJ 08103

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Anna K. Carroll

Civil Case Information Statement

Case Details: CAMDEN | Civil Part Docket# L-000477-26

Case Caption: SHORE BENJAMIN VS SCHIMPF JASON

Case Initiation Date: 02/10/2026

Attorney Name: CHRISTINA MARIE MICHELSON

Firm Name: METHFESSEL & WERBEL

Address: 2025 LINCOLN HIGHWAY STE 200 PO BOX 3012
EDISON NJ 08818

Phone: 7326506538

Name of Party: DEFENDANT : JASON SCHIMPF

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: OPEN PUBLIC RECORDS ACT (SUMMARY ACTION)

Document Type: Answer

Jury Demand: NONE

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: BENJAMIN SHORE? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO
Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

03/26/2026

Dated

/s/ CHRISTINA MARIE MICHELSON

Signed